IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE EASTERN DISTRICT OF NEW YORK

SEMYON GRINBLAT, individually and on behalf of all others similarly situated,
 	
         Plaintiff,
 	
     -against-
 	
195 BURGER CORP., **BILL WOLF PETROLEUM CORP.**, **JOHN DOE 1-X**, persons yet unknown, **Limited Liability Companies, Partnerships, Corporations 1-X**, entities yet unknown,
 	
         Defendants.
	STIPUTLATED
	JOINT STATUS REPORT
	
	CASE NO.: 19-cv-3799

On May 4, 2020, the Court ordered counsel to file an updated status report by May 11, 2020. In compliance with the Court's Order, the parties, by and through their undersigned counsel, submit the below updated Joint Status Report. In accordance with the Court's Order, the parties have conferred regarding the status of this litigation and submit the following statement of their respective interests and efforts to resolve this case.

1. This case concerns the a Burger King restraint located at 195-10 Jamaica Avenue, Hollis, NY 11423-2640 ("Burger King").

2. The Plaintiff filed this action for himself, and those similarly situated, complaining of the violations of Title III of the ADA. This action was brought under the ADA, 42 U.S.C. §12182, §12183 and §12188(a) – incorporating by reference the remedies and procedures found in 42 U.S.C. 2000a-3, §204 of the Civil Rights Act of 1964 – the ADA's

Accessibility Guidelines, 28 CFR Part 36, subpart D, the 2004 ADA Accessibility Guidelines ("ADAAG") at 36 CFR Part 1191, appendices B and D, 2010 ADA Standards for Accessible Design (hereinafter "2010 Standards"), the Building Code of the State of New York, as well as New York State Civil Rights Law §40-c and §40-d, New York State Human Rights Law §296 and New York City Human Rights Laws [Administrative Code] §8-107.

3. The parties agree that the Plaintiff's state and local law claims are factually and legally linked to the Plaintiff's ADA claims. By that the parties mean that if Burger King is found to comply with the ADA, it also complies with the New York State and local laws. If Burger King is found to be not in compliance with the ADA, the state and local laws may provide additional relief to the Plaintiff, beyond that of the ADA, if the requirements of those laws are met.

4. The parties have exchanged multiple rounds of settlement offers, but have not yet been able to reach an agreement.

5. On November 29, 2019 the Plaintiff's counsel served Rule 26 Automatic Disclosure Statement on the Defendant's counsel.

6. The Defendants have not served signed Rule 26 Automatic Disclosure Statement on the Plaintiff's counsel.

7. On November 29, 2019, the Plaintiff's counsel served Plaintiff's First Interrogatories, Requests to Admit, and Requests for Production of Documents upon the Defendants.

8. The Defendants have not responded to Plaintiff's discovery requests, including requests to admit.

9. On March 12, 2020, Plaintiff filed a Motion to Certify the Class.

10. The Defendants have not responded or opposed the Motion to Certify the Class.

11. Due to the COVID-19 pandemic and the shut-down of the subject Burger King and the offices of counsel to both Plaintiff and Defendants, the parties have not yet been able to complete expert reports, including an inspection of the property.

12. Both Plaintiff and Defendants request that the court extend the discovery deadlines previously set in the case Scheduling Order set by the Court on October 23, 2019 out six months to allow the pandemic to pass (at least in substantial part) and allow the parties to complete expert discovery and prepare the case for trial.

13. The parties intend to continue settlement discussions.

This stipulated and agreed join status report is submitted on this May 11, 2020,

/s/ Adam Ford
Adam Ford

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/s/ Jay L. Yackow
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CC: All counsel of record (via ECF)